

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

James Rutherford

v.

Plaintiff(s)

Wienerschnitzel #561, Alessandro Group, LLC and Does 1-10

Defendant(s)

CASE NUMBER:

5-18-CV-01161-CBM

**ADA DISABILITY ACCESS LITIGATION:  
APPLICATION FOR STAY  
AND EARLY MEDIATION**

1. Party (name): Alessandro Group, LLC requests a stay of proceedings and early mediation through the Court's ADR Program
2. The complaint in this case asserts a claim under Title III of the Americans with Disabilities Act ("ADA"), 42 U.S.C. §§ 12181-12189.
3. The party filing this Application for Stay and Early Mediation requests that the Court:
  - a. Stay these proceedings;
  - b. Schedule an early mediation through the Court's ADR Program;
  - c. Order Plaintiff to file with the Court and serve on Defendant(s) within fourteen (14) days of the date of the Order granting Application for Stay and Early Mediation a statement that includes the following:
    - 1) An itemized list of specific conditions on the subject premises that are the basis of the claimed violations of the ADA; and
    - 2) An itemized list of damages and, for each item, the amount sought.
  - d. Order Defendant to file with the Court and serve on Plaintiff(s) at least ten (10) days before the date set for the early mediation any evidence Defendant intends to rely upon to support a claim that the alleged violations have been remedied or that no violation exists.

Date: July 31, 2018

Marc Cohen, Esq.

Type or Print Name



Signature of Attorney (or Party without Attorney)

**Opposition to this Application for Stay and Early Mediation  
must be filed no later than seven (7) days from the date of service of this  
Application for Stay and Early Mediation.**